

**IN THE UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF ILLINOIS  
URBANA DIVISION**

UNITED STATES OF AMERICA, )

Plaintiff, )

vs. )

Case No. 17-CR-20037

BRENDT A. CHRISTENSEN, )

Defendant. )

**SPECIAL VERDICT FORM**

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**Section I: Age of Defendant**

General Directions for Section I

In this section, please indicate whether you unanimously find that the United States has established beyond a reasonable doubt that the defendant was eighteen (18) years of age or older at the time he committed the capital offense of kidnaping resulting in death, as charged in Count One. You must mark one of the responses. Please have the foreperson sign by juror number after your verdict.

\_\_\_\_\_ We unanimously find that it was proven beyond a reasonable doubt that the defendant was eighteen (18) years of age when he committed the offense.

\_\_\_\_\_ We unanimously find that it was not proven beyond a reasonable doubt that the defendant was eighteen (18) years of age when he committed the offense.

\_\_\_\_\_  
**Foreperson**  
**(Juror Number)**

\_\_\_\_\_  
**Date**

**Directions:**

1. If you unanimously find the United States has proven beyond a reasonable doubt that the defendant was eighteen years of age or older at the time of the offense, continue on to Section II as to that Defendant.
2. If you unanimously find the United States has not proven beyond a reasonable doubt that a defendant was eighteen years of age or older at the time of the offense, skip forward to Section VII and complete that section in accordance with the directions there. Then notify the Court that you have completed your deliberations.

## Section II: Threshold Intent Factors

General directions for Section II:

You may only complete this section if you have unanimously found that the United States has proven beyond a reasonable doubt that the defendant was 18 years of age or older at the time of the offense.

In this section, please indicate whether the United States has proven beyond a reasonable doubt any of the following threshold intent factors. You may find that the United States has proven more than one threshold intent factor. For each of the threshold intent factors listed below, you must mark one of the responses. Please have the foreperson sign by juror number after each verdict.

**1. The defendant intentionally killed Yingying Zhang:**

\_\_\_\_\_ We unanimously find that this factor has been proven beyond a reasonable doubt.

\_\_\_\_\_ We unanimously find that this factor has not been proven beyond a reasonable doubt.

\_\_\_\_\_  
**Foreperson**  
**(Juror Number)**

\_\_\_\_\_  
**Date**

**2. The defendant intentionally inflicted serious bodily injury that resulted in the death of Yingying Zhang:**

\_\_\_\_\_ We unanimously find that this factor has been proven beyond a reasonable doubt.

\_\_\_\_\_ We unanimously find that this factor has not been proven beyond a reasonable doubt.

\_\_\_\_\_  
**Foreperson**  
**(Juror Number)**

\_\_\_\_\_  
**Date**

3. **The defendant intentionally participated in an act, contemplating that the life of a person would be taken, or intending that lethal force would be used in connection with a person, and Yingying Zhang died as a direct result:**

\_\_\_\_\_ We unanimously find that this factor has been proven beyond a reasonable doubt.

\_\_\_\_\_ We unanimously find that this factor has not been proven beyond a reasonable doubt.

\_\_\_\_\_  
**Foreperson**  
**(Juror Number)**

\_\_\_\_\_  
**Date**

4. **The defendant intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, such that participation in the act constituted a reckless disregard for human life and Yingying Zhang died as a direct result.**

\_\_\_\_\_ We unanimously find that this factor has been proved beyond a reasonable doubt.

\_\_\_\_\_ We unanimously find that this factor has not been proved beyond a reasonable doubt.

\_\_\_\_\_  
**Foreperson**  
**(Juror Number)**

\_\_\_\_\_  
**Date**

**Directions:**

1. If you unanimously find at least one threshold intent factor, continue on to Section III.
2. If you unanimously find the United States has not proven beyond a reasonable doubt at least one threshold intent factor, skip forward to Section VII and complete that section in accordance with the directions there. Then notify the Court that you have completed your deliberations.

**Section III: Statutory Aggravating Factors**

General directions for Section III:

You may only complete this section if you have unanimously found that the defendant was 18 years of age or older at the time of the offense (as indicated by your findings in Section I), and at least one threshold intent factor (as indicated by your findings in Section II).

In this section, please indicate which, if any, of the following three (3) statutory aggravating factors you unanimously find the United States has proven beyond a reasonable doubt. You may find that the United States has proven more than one statutory aggravating factor. For each of the statutory aggravating factors listed below, you must mark one of the responses. Please have the foreperson sign by juror number after each verdict.

**1. The death of Yingying Zhang occurred during the commission of the crime of Kidnapping, in violation of Title 18, United States Code, Section 1201.**

\_\_\_\_\_ We unanimously find that this factor has been proven beyond a reasonable doubt.

\_\_\_\_\_ We unanimously find that this factor has not been proven beyond a reasonable doubt.

\_\_\_\_\_  
**Foreperson**  
**(Juror Number)**

\_\_\_\_\_  
**Date**

2. **The defendant committed the offense in an especially heinous, cruel, or depraved manner in that it involved torture or serious physical abuse to Yingying Zhang.**

\_\_\_\_\_ We unanimously find that this factor has been proven beyond a reasonable doubt because the defendant tortured Yingying Zhang.

\_\_\_\_\_ We unanimously find that this factor has been proven beyond a reasonable doubt because the defendant inflicted serious physical abuse upon Yingying Zhang.

\_\_\_\_\_ We unanimously find that this factor has not been proven beyond a reasonable doubt.

\_\_\_\_\_  
**Foreperson**  
**(Juror Number)**

\_\_\_\_\_  
**Date**

3. **The defendant committed the offenses after substantial planning and premeditation to cause the death of Yingying Zhang:**

\_\_\_\_\_ We unanimously find that this factor has been proven beyond a reasonable doubt.

\_\_\_\_\_ We unanimously find that this factor has not been proven beyond a reasonable doubt.

\_\_\_\_\_  
**Foreperson**  
**(Juror Number)**

\_\_\_\_\_  
**Date**

**Directions:**

1. If you unanimously find one or more statutory aggravating factors, continue on to Section IV.
2. If you unanimously find the government has not proven beyond a reasonable doubt at least one statutory aggravating factor, skip forward to Section VII and complete the section in accordance with the directions there. Then notify the Court that you have completed your deliberations.

### Section IV: Non-statutory Aggravating Factors

#### General Directions for Section IV:

You may only complete this section if you have unanimously found that the United States has proven beyond a reasonable doubt that the defendant was 18 years of age or older at the time of the offense (as indicated by your findings in Section I), at least one threshold intent factor (as indicated by your findings in Section II), and at least one statutory aggravating factor (as indicated by your findings in Section III).

In this section, please indicate which, if any, of the following six (6) non-statutory aggravating factors you unanimously find the United States has proven beyond a reasonable doubt. You may find that the United States has proven more than one non-statutory aggravating factor. For each of the proposed factors, you must mark one of the responses provided. Please have the foreperson sign by juror number after each verdict.

1. **The defendant caused injury, harm, and loss to Yingying Zhang and loss to her family, friends, and co-workers. The injury, harm, and loss caused by the defendant is evidenced by Yingying Zhang's personal characteristics and by the impact of her death upon her family, friends, and co-workers.**

\_\_\_\_\_ We unanimously find that this factor has been proven beyond a reasonable doubt.

\_\_\_\_\_ We unanimously find that this factor has not been proven beyond a reasonable doubt

\_\_\_\_\_  
**Foreperson**  
**(Juror Number)**

\_\_\_\_\_  
**Date**

2. **The defendant is likely to commit criminal acts of violence in the future that would constitute a continuing and serious threat to the lives and safety of others, as evidenced by, at least, his demonstrated lack of remorse for his acts of violence; his expressed desire to be known as a killer; and his claims of additional victims and expertise in avoiding detection.**

\_\_\_\_\_ We unanimously find that this factor has been proven beyond a reasonable doubt.

\_\_\_\_\_ We unanimously find that this factor has not been proven beyond a reasonable doubt.

\_\_\_\_\_  
**Foreperson**  
**(Juror Number)**

\_\_\_\_\_  
**Date**

3. **The defendant has demonstrated, by statements he made following the offense, that he lacked remorse for kidnapping and killing Yingying Zhang.**

\_\_\_\_\_ We unanimously find that this factor has been proven beyond a reasonable doubt.

\_\_\_\_\_ We unanimously find that this factor has not been proven beyond a reasonable doubt.

\_\_\_\_\_  
**Foreperson**  
**(Juror Number)**

\_\_\_\_\_  
**Date**

4. **The victim, Yingying Zhang, was particularly vulnerable due to her small stature and limited ability to communicate in English.**

\_\_\_\_\_ We unanimously find that this factor has been proven beyond a reasonable doubt.

\_\_\_\_\_ We unanimously find that this factor has not been proven beyond a reasonable doubt.

\_\_\_\_\_  
**Foreperson**  
**(Juror Number)**

\_\_\_\_\_  
**Date**



5.     **The defendant attempted to obstruct the investigation of this offense by, at least, making false statements to investigators; destroying or concealing the victim’s remains; and sanitizing the crime scene.**

\_\_\_\_\_     We unanimously find that this factor has been proven beyond a reasonable doubt.

\_\_\_\_\_     We unanimously find that this factor has not been proven beyond a reasonable doubt.

\_\_\_\_\_  
**Foreperson**  
**(Juror Number)**

\_\_\_\_\_  
**Date**

**Directions:**

1.     After you have completed your findings in this section (whether or not you have found any of the above non-statutory aggravating factors to have been proven), continue on to Section V.

### Section V: Mitigating Factors

General Directions for Section V:

You may only complete this section if you have unanimously found that the United States has proven beyond a reasonable doubt that the defendant was 18 years of age or older at the time of the offense (as indicated by your findings in Section I), at least one threshold factor (as indicated by your findings in Section II), and at least one statutory aggravating factor (as indicated by your findings in Section III).

As to the alleged mitigating factors listed below, please indicate which, if any, you find the defendant has proven by a preponderance of the evidence.

Recall that your vote as a jury need not be unanimous with regard to each question in this section. A finding with respect to a mitigating factor may be made by one or more of the members of the jury, and any member of the jury who finds the existence of a mitigating factor may consider such a factor established in making his or her individual determination of whether or not to impose a sentence of death, regardless of the number of other jurors who agree that the factor has been established. You are not required to consider a mitigating factor that you do not believe was proven, even if another juror believes that it was proven.

In the space provided, please indicate the number of jurors who have found the existence of that mitigating factor to be proven by a preponderance of the evidence. Please have the foreperson sign by juror number after each verdict.

1. I/we members of the jury find by a preponderance of the evidence that the Defendant did not have a significant prior history of other criminal conduct at the time of the commission of the offenses in which he has been convicted, and this factor

Number of Jurors who so found: \_\_\_\_\_

\_\_\_\_\_  
**Foreperson**  
**(Juror Number)**

\_\_\_\_\_  
**Date**

Additional Directions for Section V:

The law permits you to consider during your deliberations any other factor or factors in the defendant's background, record, character, or any other circumstances of the offense that mitigate against imposition of a death sentence.

The following extra spaces are provided to write in additional mitigating factors, if any, found by any one or more jurors. If more space is needed, write "CONTINUED" and use the reverse side of this page.

1. Additional mitigating factor:

Number of jurors who so find: \_\_\_\_\_

\_\_\_\_\_  
**Foreperson**  
**(Juror Number)**

\_\_\_\_\_  
**Date**

**Directions:**

1. After you have completed your findings in this section (whether or not you have found any mitigating factors in this section), continue on to Section VI.

## **Section VI: Determination of Sentence**

General directions for Section VI:

You may not impose a sentence of death unless you have first found, unanimously and beyond a reasonable doubt, that the defendant was eighteen years of age or older at the time of the offense charged in the count in Section I, and at least one threshold intent factor in Section II, and at least one statutory aggravating factor in Section III.

In this section, enter your determination of the defendant's sentence with regard to Count One. Please have the foreperson sign by juror number after your verdict. Based upon consideration of whether the aggravating factor or factors found to exist for each count sufficiently outweigh the mitigating factor or factors found to exist for that count to justify a sentence of death:

### **Count One:** **Kidnapping Resulting in the Death of Yinging Zhang:**

\_\_\_\_\_ Life Imprisonment Without the Possibility of Parole.  
\_\_\_\_\_ Death.

\_\_\_\_\_  
**Foreperson**  
**(Juror Number)**

\_\_\_\_\_  
**Date**

### **Directions:**

1. After you have completed your sentence determination in this section (regardless of what determination was made), continue on to Section VII.

**Section VII: Justice Without Discrimination**

By signing below, each juror certifies that consideration of the race, color, religious beliefs, national origin, or sex of the defendant or the victims was not involved in reaching his or her individual decision, and that the individual juror would have made the same recommendation regarding a sentence for the crime or crimes in question regardless of the race, color, religious beliefs, national origin, or sex of the defendant, or the victim.

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